DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

April 5, 2004

MEMORANDUM

From: BRAC Operations, NAVFAC, EFDSW (06CA.LO)

Subj: PROGRESS REPORT, N62474-98-D-2076/114, RCRA REMOVAL ACTIONS, IWTP 25 AND 32, ALAMEDA POINT, ALAMEDA, CALIFORNIA

Encl: (1) Progress Report #1 – March 2004

Enclosure (1) is forwarded for your information.

Should you have any questions, please contact Mr. Dan Shafer at 916- 565-4328, or me at 619-532-0969.

LOU A. OCAMPO

Distribution:

1. Dean Wright, DTSC, Sacramento
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Ans: 3 copies 4/16/04

Field Progress Report #1 – March 2004

CTO & Site Name	0114 – IWTPs 25 and 32
Project Objective:	Remove or render unusable all waste tanks/units and waste conveyance piping from Industrial Waste Treatment Plants (IWTPs) 25 and 32 in accordance with the following: 1. *Final Amendment to the Closure Plan – IWTP 25*, dated October 2003 2. *Final Amendment to the Closure Plan – IWTP 32*, dated December 8, 2003 3. *Amendment to the Closures of IWTPs 25 and 32, Final Work Plan*, dated December 17, 2003 Removal of the waste units/piping at IWTPs 25 and 32 is being performed to achieve closure of the Resource Conservation and Recovery Act (RCRA) Part B Permit for these facilities.
Reporting Period:	March 1 to March 31, 2004
Site(s) Addressed During Reporting Period:	**IWTP 25** 1. Waste media sampling and analysis a) Paint chips from select units b) Standing water in equalization tanks and piping trenches c) Filter press fabric **IWTP 32** 1. Waste media sampling and analysis a) Rinsate water from waste piping b) Paint chips from select tanks c) Water in chromium and cyanide waste sumps d) Filter press fabric e) Resin floor coating from basement 2. Electrical lock out / tag out 3. Waste conveyance piping removal and waste tank rendering/removal
Summary of Activities Performed in This Reporting Period:	Field work for tank and piping removal commenced March 15, 2004 with mobilization to IWTP 32 and setting up exclusion zones and staging areas for piping and tank removal activities; piping removal commenced March 16, 2004. As of March 31, 2004, all waste conveyance piping, flanges, and valves, totaling approximately 9,191 lineal feet (LF), have been removed from IWTP 32 (vat area, basement, and main treatment area) and loaded into macro-encapsulation bins pending transportation and disposal. Additionally, ten tanks were closed in-place by rendering them unusable by cutting up to four one-foot square holes in them; eight other tanks were demolished and loaded into bins for disposal or recycling (see Figure 1).

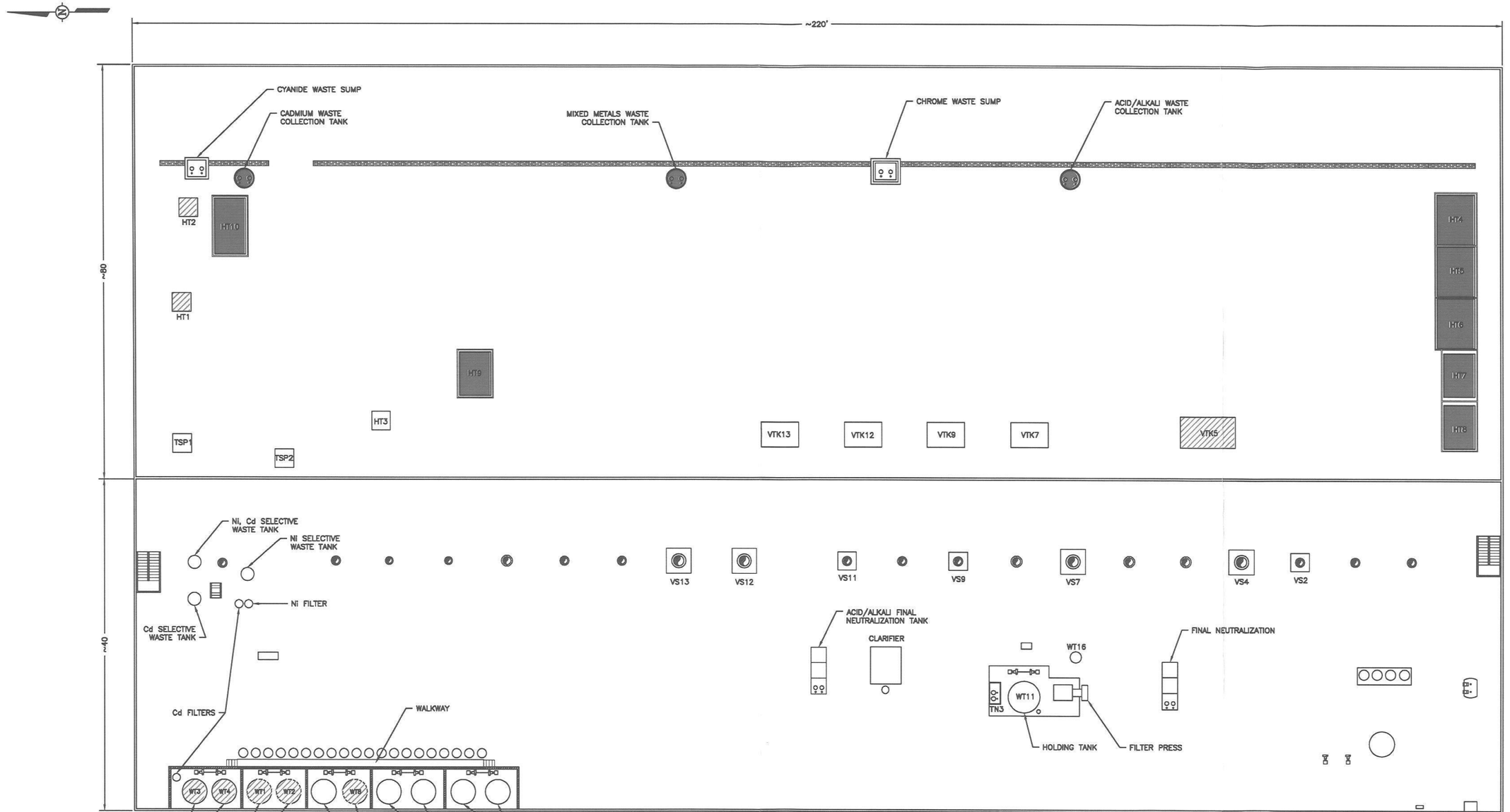
CTO & Site Name	0114 – IWTPs 25 and 32		
Photos:	See attached for photos taken during IWTP 32 removal activities.		
Detail of Items Removed or Rendered Unusable:	Waste Tanks/Units	HT-1: Spent Cyanide Plating Solution – demolished HT-2: Spent Cyanide Plating Solution – demolished HT-4: Spent Acid/Alkaline & Mixed Metals Plating Solution – rendered unusable HT-5: Spent Cadmium, Chromium, and Mixed Metals Plating Solution – rendered unusable HT-6: Spent Chromium $ Acid/Alkaline Plating Solution – rendered unusable HT-7: Spent Acid/Alkaline & Mixed Metals Plating Solution – rendered unusable HT-8: Spent Chromium & Acid/Alkaline Plating Solution – rendered unusable HT-9: Spent Acid/Alkaline & Mixed Metals Plating Solution – rendered unusable HT-10: Spent Cyanide Plating Solution – rendered unusable Sump-2: Cadmium Waste Collection Tank – rendered unusable Sump-4: Mixed Metals Waste Collection Tank – rendered unusable Sump-5: Acid/Alkaline Waste Collection Tank – rendered unusable VTK-5: Mixed Metals Waste Tank – demolished WT-1: Cyanide Waste Tank – demolished WT-2: Cyanide Waste Tank – demolished WT-3: Cadmium Waste Tank – demolished WT-4: Cadmium Waste Tank – demolished WT-8: Chrome Waste Tank – demolished	
	Waste Piping Removed	Chrome Waste	2,148 LF
		Cyanide Waste	931 LF
		Cadmium Waste	1,695 LF
		Acid/Alkaline Waste	1,801 LF
		Mixed Metals Waste	1,268 LF
		Nickel Waste	350 LF
		Industrial Waste	968 LF
		Various Flanges/Fittings	30 LF
		Total:	9,191 LF

CTO & Site Name	0114 – IWTPs 25 and 32
Media Sampling and Analysis:	Prior to dismantling activities, samples of various waste media were collected for laboratory analysis to determine appropriate transportation and disposal requirements (see Evaluation of Analytical Results below). Specifically, media were analyzed for the following: **IWTP 25** 1. Filter Press Fabric: metals (Method 6010B); mercury (Method 7471A); cyanide (Method E335.2) 2. Paint Chips (select units): lead (Method 6010B including toxicity characteristic leaching procedure [TCLP] and soluble threshold limit concentration [STLC]) 3. Water (trenches and Equalization tanks): cyanide (Method E335.2); oil and grease (Method E1664A); phenolics (Method E420.1); metals (Method 6010B); mercury (Method 7470A); volatile organic compounds (VOCs) (Method 8260B); semivolatile organic compounds (SVOCs) (Method 8270C) **IWTP 32** 1. Piping Rinsate: metals (Method 6010B); mercury (Method 7470A); cyanide (Method E335.2) 2. Basement Floor Resin Coating: metals (Method 6010B); mercury (Method 7471A); cyanide (Method E335.2) 3. Filter Press Fabric: metals (Method 6010B); mercury (Method 7471A); cyanide (Method E335.2) 4. Paint Chips (select units): lead (Method 6010B) 5. Water (sumps): cyanide (Method E335.2); oil and grease (Method E1664A); phenolics (Method E420.1); metals (Method 6010B); mercury (Method 7470A); VOCs (Method 8260B); SVOCs (Method 8270C)
Evaluation of Analytical Results:	1. Disposition of the waste conveyance piping from IWTP 32 was made based on testing of rinsate water from the pipes. High metals concentrations, specifically cadmium and chromium, classify the pipes as RCRA class 1 hazardous requiring treatment prior to disposal. Cadmium results ranged from 5.7 milligrams per liter (mg/L) to 13.7 mg/L, exceeding the regulated limit of 1 mg/L. Chromium results ranged from 75.5 mg/L to 179 mg/L, exceeding the regulated limit of 5 mg/L. Treatment will be by means of macro encapsulation for RCRA wastes (i.e., pipes and pipe debris). 2. Analysis of the resin coating from the IWTP 32 basement floor resulted in a high concentration of cadmium (108 milligrams per kilogram [mg/kg]), which exceeds the California limit of 100 mg/kg for solids. Based upon these analytical results, the Flooring waste from IWTP-32 will be classified as RCRA-hazardous for Cadmium. (Regulatory limit is 1 mg/L, sample result is 1.49 mg/L) 3. Analysis of fabric from the filter press at IWTP 25 resulted in a concentration of total chromium (1,140 mg/kg) below its total threshold limit concentration (TTLC) of 2,500 mg/kg, but exceeding ten times its STLC of 5 mg/L. TCLP analysis resulted in a concentration of 1.1 mg/L, therefore rendering the IWTP 25 filter press fabric non-hazardous waste. Analysis of fabric from the filter press at IWTP 32 resulted in a concentration of cadmium (132 mg/kg) exceeding its TTLC of 100 mg/kg, rendering it a California hazardous waste. 4. Analysis of paint chips for lead resulted in concentrations below regulatory limits and, therefore, considered non-hazardous. 5. Analysis of water samples collected from IWTP 32 sumps and select IWTP 25 units were either non-detect or below Publicly-Owned Treatment Works discharge limits.
Schedule:	See attached for updated project schedule.

Figure

IMAGE	X-REF	OFFICE	DRAWING NUMBER
---	-	CONCORD	101643-B1

DRAWN BY	CHECKED BY	APPROVED BY
SJZ 3/31/04	SK 3/31/04	



NOT TO SCALE

LEGEND

- TANK RENDERED UNUSABLE
- TANK REMOVED
- TRENCH WITH GRATING
- SECONDARY CONTAINMENT BERM
- VENT STACK
- SCRUBBER

TANKS REMOVED/RENDERED UNUSABLE AS OF 3-31-04

Shaw Environmental, Inc.

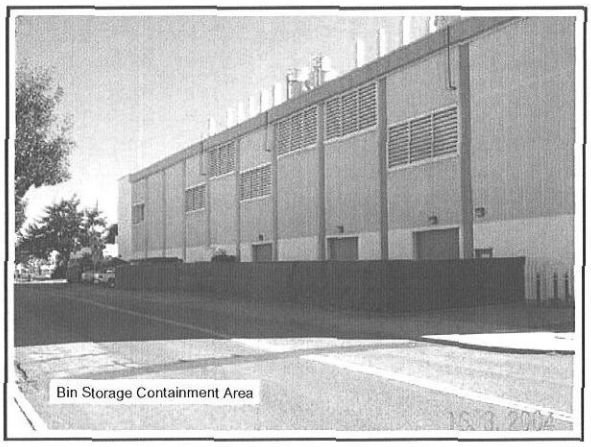
DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST DIVISION
SAN DIEGO, CALIFORNIA

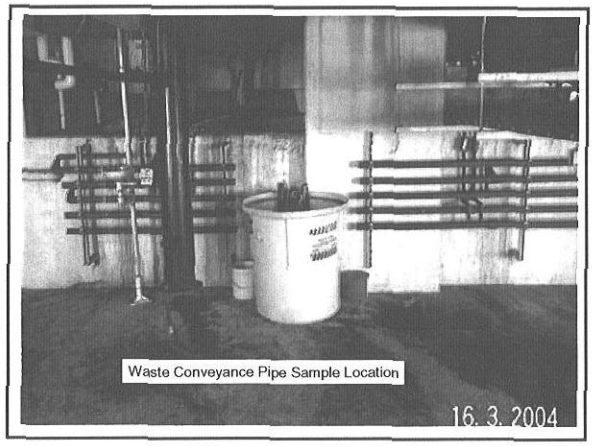
FIGURE 1

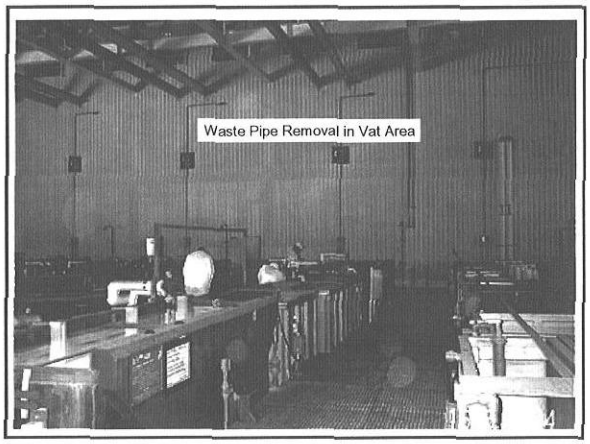
RCRA REMOVAL ACTIONS AT IWTP 32

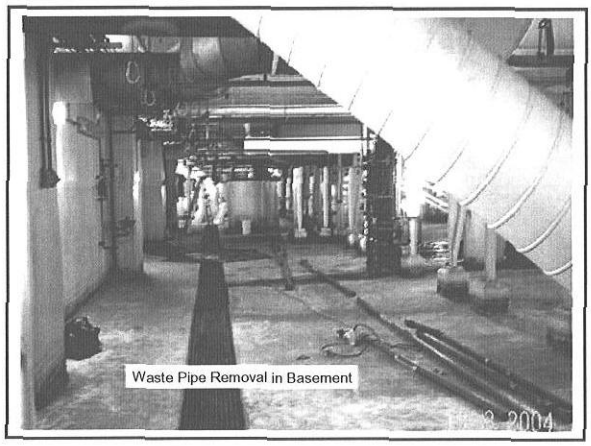
ALAMEDA POINT
ALAMEDA, CALIFORNIA

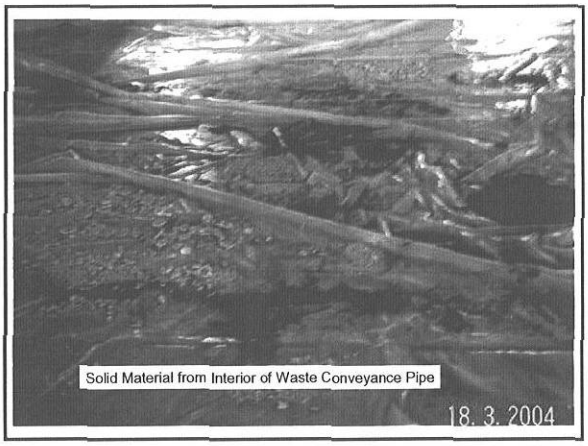
Photos

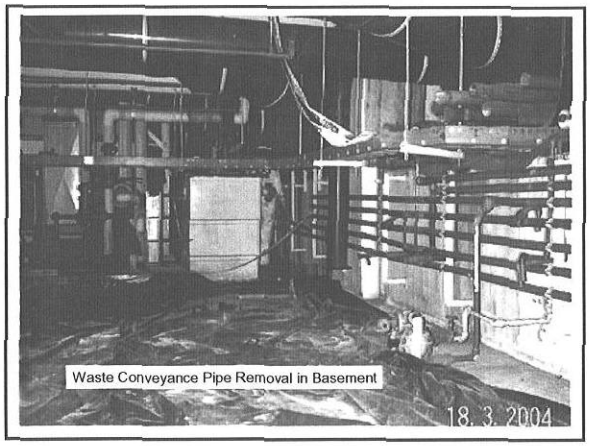

Bin Storage Containment Area

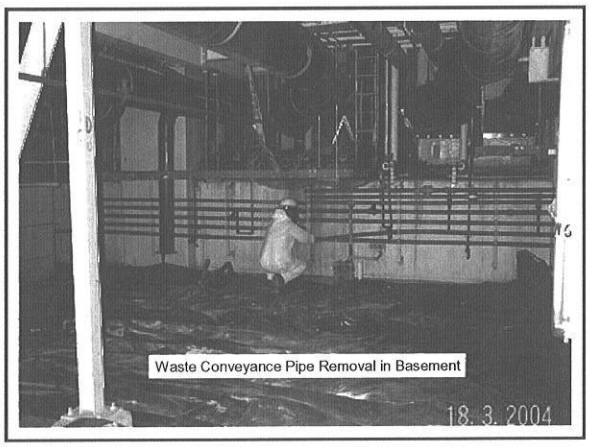

Waste Conveyance Pipe Sample Location
16. 3. 2004

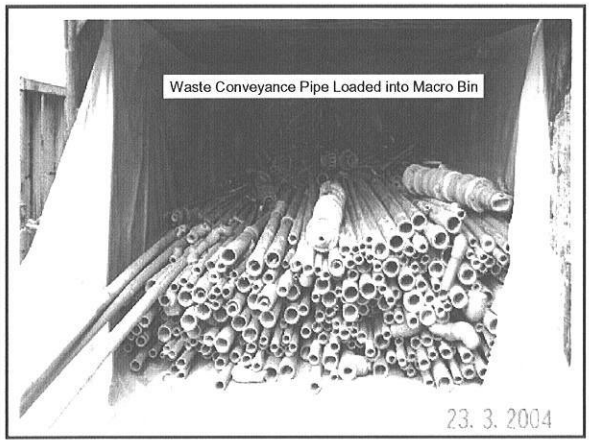

Waste Pipe Removal in Vat Area

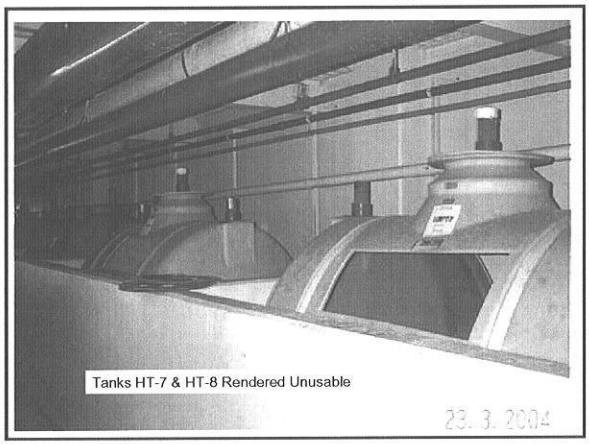

Waste Pipe Removal in Basement

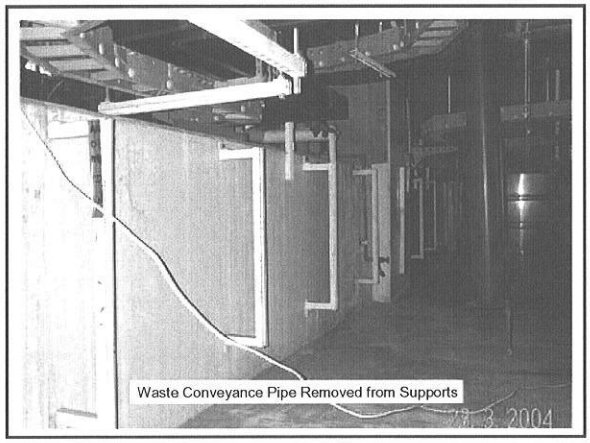

Solid Material from Interior of Waste Conveyance Pipe
18. 3. 2004

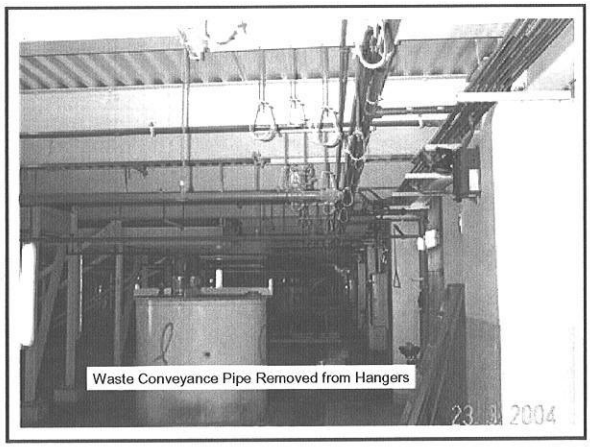

Waste Conveyance Pipe Removal in Basement
18. 3. 2004

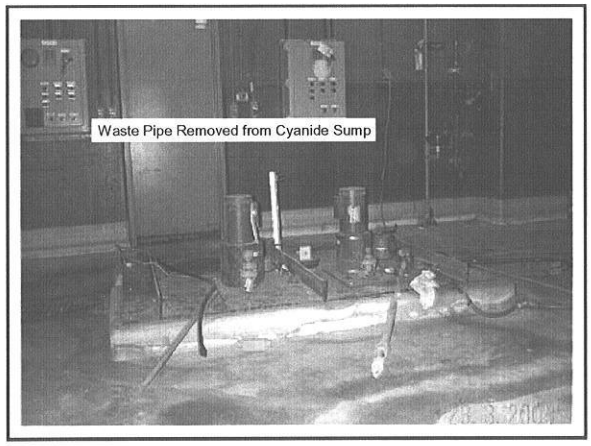

Waste Conveyance Pipe Removal in Basement
18. 3. 2004

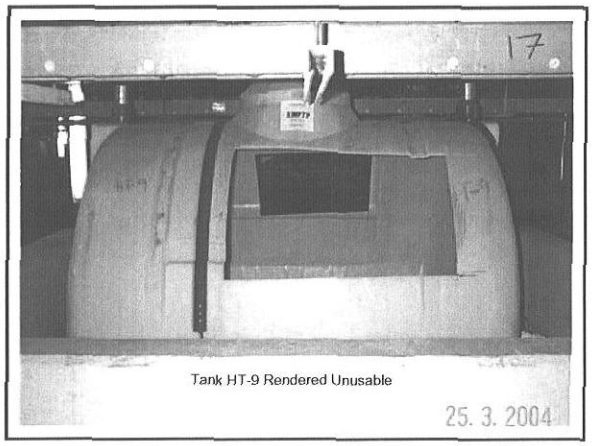

Waste Conveyance Pipe Loaded into Macro Bin
23. 3. 2004

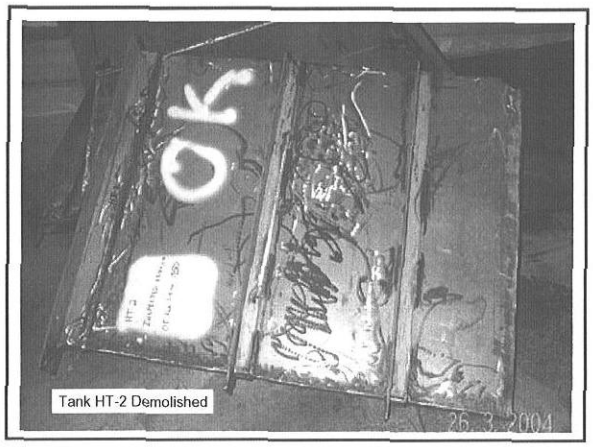

Tanks HT-7 & HT-8 Rendered Unusable
23. 3. 2004

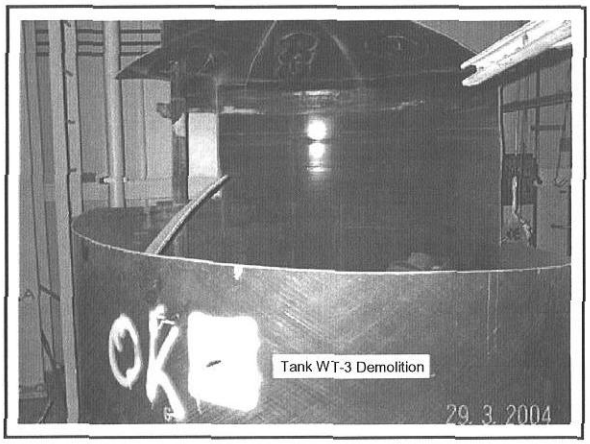

Waste Conveyance Pipe Removed from Supports

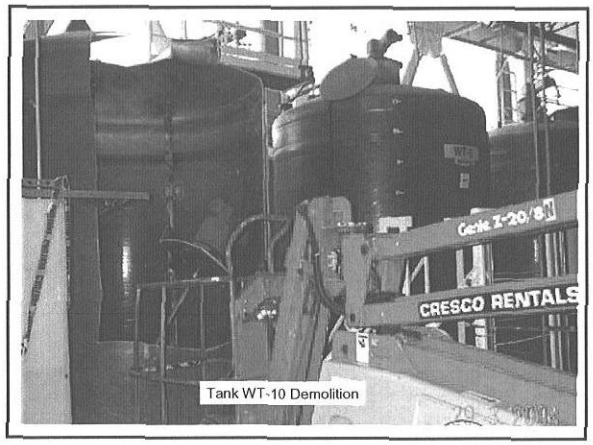

Waste Conveyance Pipe Removed from Hangers

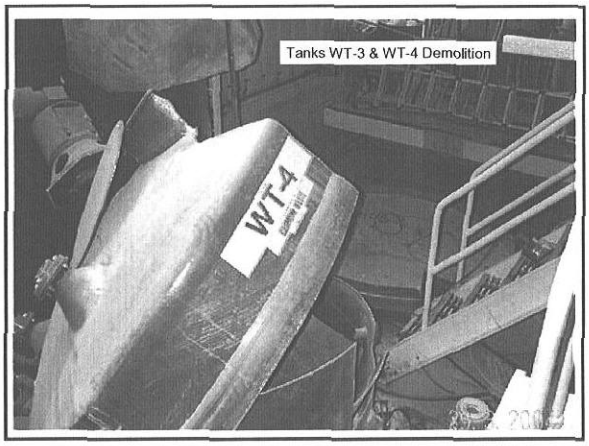

Waste Pipe Removed from Cyanide Sump

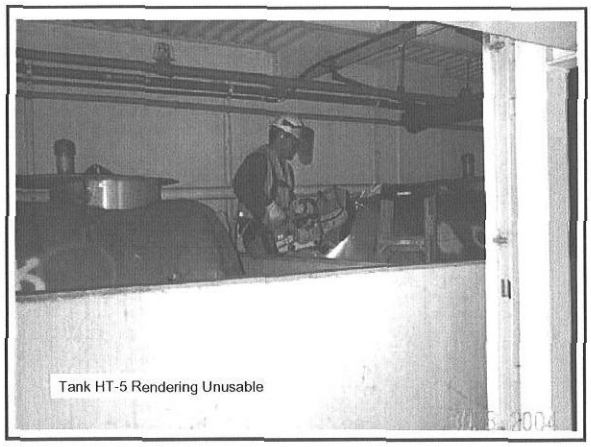

17
Tank HT-9 Rendered Unusable
25. 3. 2004

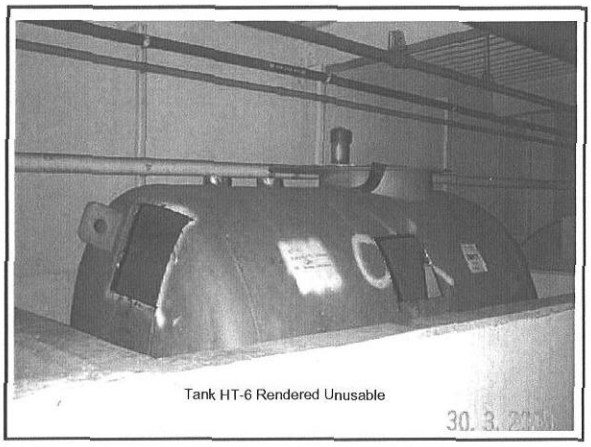

OK
Tank HT-2 Demolished


OK
Tank WT-3 Demolition
29. 3. 2004

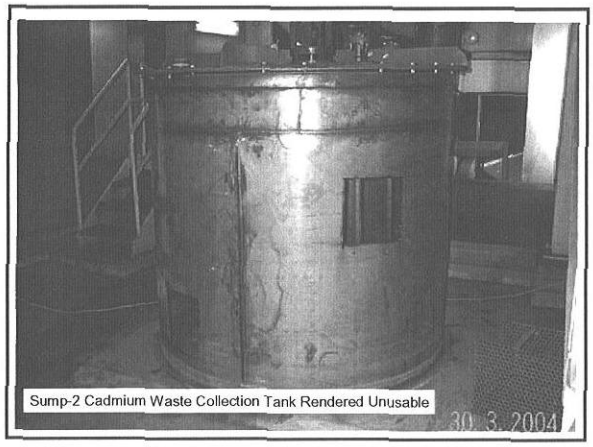

CRESCO RENTALS
Tank WT-10 Demolition


Tanks WT-3 & WT-4 Demolition
WT-4

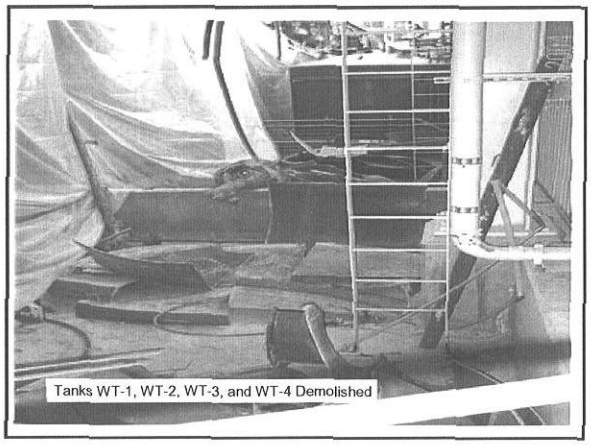

Tank HT-5 Rendering Unusable



Tank HT-6 Rendered Unusable



Sump-2 Cadmium Waste Collection Tank Rendered Unusable

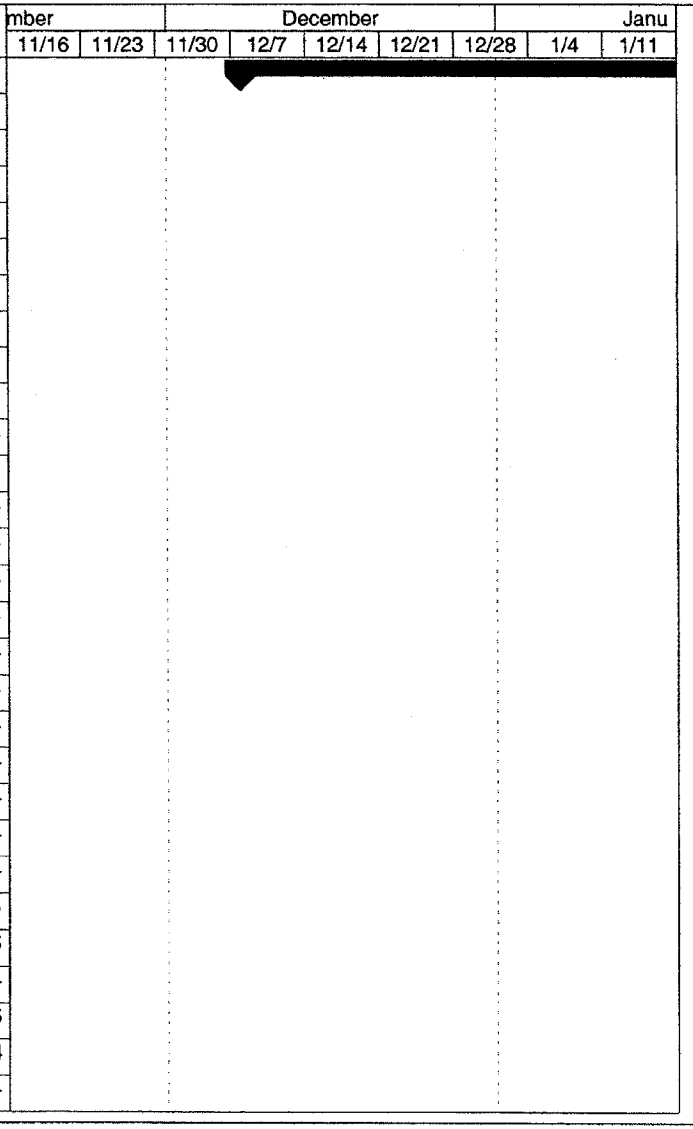


Tanks WT-1, WT-2, WT-3, and WT-4 Demolished

Schedule

Project Schedule
Removal/Closure of IWTPs 25 and 32
Alameda Point, California

ID	Task Name	Start	Finish
1	**Pre-Construction Activities**	**Mon 12/8/03**	**Tue 5/3/05**
8			
9	**Field/Construction**	**Mon 2/16/04**	**Wed 1/12/05**
10	**IWTP 25 & 32 Tank and Piping Removal**	**Mon 2/16/04**	**Wed 1/12/05**
11	Facility Lockout/Tagout	Mon 2/16/04	Fri 4/30/04
12	Daily AHA Evaluation	Mon 3/15/04	Thu 6/17/04
13	Miscellaneous Waste Sampling	Mon 2/16/04	Fri 4/30/04
14	**Tank and Piping Removal**	**Mon 3/15/04**	**Fri 5/28/04**
15	Mobilization	Mon 3/15/04	Tue 3/16/04
16	Tagging/Removal of IWTP 32 Piping	Tue 3/16/04	Fri 3/26/04
17	Removal/In-Place Closure of IWTP 32 Tanks/Units	Fri 3/19/04	Mon 4/19/04
18	In-Place Closure of IWTP 32 Sumps	Thu 4/1/04	Wed 4/14/04
19	Removal of IWTP 32 Basement Floor Coating	Thu 4/15/04	Fri 4/23/04
20	Tagging/Removal of IWTP 25 Piping	Tue 4/20/04	Fri 4/23/04
21	Removal of IWTP 25 Tanks/Units	Fri 4/23/04	Tue 5/25/04
22	Final Inspection	Wed 5/26/04	Wed 5/26/04
23	Demobilization	Thu 5/27/04	Fri 5/28/04
24	T&D	Wed 4/7/04	Wed 5/26/04
25	Utility Location	Tue 6/1/04	Wed 6/2/04
26	Site Surveying	Mon 6/28/04	Tue 6/29/04
27	Subsurface Soil & GW Sampling	Thu 6/3/04	Fri 6/25/04
28	Data Validation	Mon 8/2/04	Tue 8/31/04
29	Data Management	Thu 7/1/04	Fri 11/12/04
30	NEDTS	Wed 12/15/04	Wed 1/12/05
31	**IWTP 25 & 32 Tank Reports**	**Tue 3/30/04**	**Thu 2/10/05**
32	Tank Removal Reporting (monthly)	Tue 3/30/04	Thu 7/15/04
33	**Closure Reports**	**Mon 6/28/04**	**Thu 2/10/05**
34	**IWTP 32**	**Mon 6/28/04**	**Thu 12/23/04**
35	Report Preparation	Mon 6/28/04	Fri 8/6/04

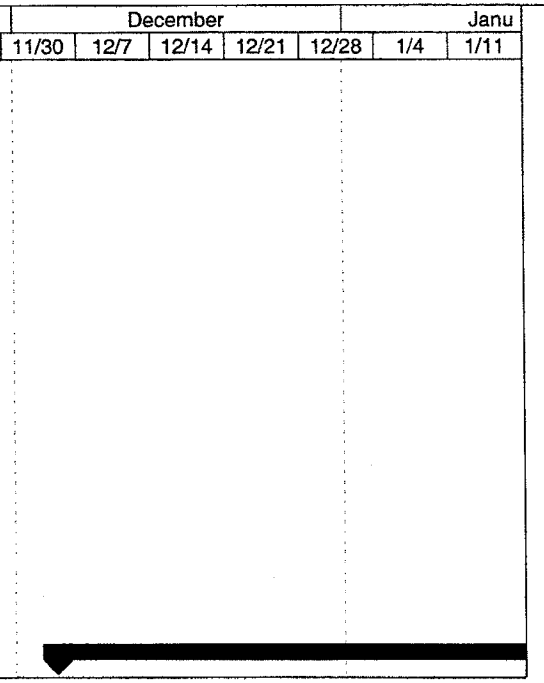


Project: 101643 (CTO 114)
Date: Fri 4/2/04

Task
Split
Progress
Milestone
Summary
Project Summary
External Tasks
External Milestone
Deadline

Project Schedule
Removal/Closure of IWTPs 25 and 32
Alameda Point, California

ID	Task Name	Start	Finish
36	Submit Internal Draft to Navy	Fri 8/6/04	Fri 8/6/04
37	Navy Review	Mon 8/9/04	Mon 8/30/04
38	RTC and Prepare Draft	Tue 8/31/04	Wed 10/13/04
39	Submit Draft to Navy and DTSC	Wed 10/13/04	Wed 10/13/04
40	DTSC Review	Thu 10/14/04	Fri 11/12/04
41	RTC and Prepare Final	Mon 11/15/04	Thu 12/23/04
42	Submit Final to Navy and DTSC	Thu 12/23/04	Thu 12/23/04
43	**IWTP 25**	**Mon 8/9/04**	**Thu 2/10/05**
44	Report Preparation	Mon 8/9/04	Mon 9/20/04
45	Submit Internal Draft to Navy	Mon 9/20/04	Mon 9/20/04
46	Navy Review	Tue 9/21/04	Tue 10/12/04
47	RTC and Prepare Draft	Wed 10/13/04	Wed 11/24/04
48	Submit Draft to Navy and DTSC	Wed 11/24/04	Wed 11/24/04
49	DTSC Review	Mon 11/29/04	Tue 12/28/04
50	RTC and Prepare Final	Wed 12/29/04	Thu 2/10/05
51	Submit Final to Navy and DTSC	Thu 2/10/05	Thu 2/10/05
52	**Distributives/Management**	**Fri 12/5/03**	**Fri 6/3/05**



Project: 101643 (CTO 114)
Date: Fri 4/2/04

Task
Split
Progress
Milestone
Summary
Project Summary
External Tasks
External Milestone
Deadline